

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.
REGARDING ITS REQUEST TO BE HEARD AT THE
NOVEMBER 2-3, 2022, OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order Regarding Procedures for November 2-3, 2022, Omnibus Hearing* (ECF No. 22668) and respectfully states as follows:

2. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in-person in the New York courtroom and reserve the right to be heard on behalf of Syncora at the November 2-3, 2022, Omnibus Hearing.

¹ The Debtors in these Title III cases, along with each Debtor’s respective bankruptcy case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. Mr. Kirpalani intends to be heard on any matter raised by or presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora.

4. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

DATED: October 27, 2022

Respectfully submitted,

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By : /s/ Rafael Escalera
Rafael Escalera
USDC No. 122609
escalera@reichardescalera.com

Susheel Kirpalani (*pro hac vice*)
susheelkirpalani@quinnemanuel.com

Sylvia M. Arizmendi
USDC-PR 210714
arizmendis@reichardescalera.com

Daniel Salinas
USDC-PR 224006
danielsalinas@quinnemanuel.com

Carlos R. Rivera-Ortiz
USDC-PR 303409
riverac@reichardescalera.com

Eric Kay (*pro hac vice*)
erickay@quinnemanuel.com

Joshua Rodríguez-Rivera
USDC-PR 308601
jrodriguez@reichardescalera.com

51 Madison Avenue, 22nd Floor
New York, New York 10010-1603

255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, Puerto Rico 00917-1913

Co-Counsel for Syncora Guarantee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz
USDC-PR 303409

EXHIBIT A

PARTY APPEARANCE SHEET

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person NY
	Name	Susheel Kirpalani
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Email	susheelkirpalani@quinnemanuel.com
	Phone Number	212-849-7200
	Docket Entry No. of Notice of Appearance	ECF No. 22609